

SAS-JMR/2004R00398

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA)	CRIMINAL NO. 05-888 (FLW)
)	
v.)	
)	
MATTHEW D. THOMPCKINS,)	18 U.S.C. §§ 2423(a) and (e)
a/k/a "Seymore Benjamin,")	18 U.S.C. § 2253
a/k/a "Craig Williams,")	
a/k/a "Brandon Williams")	
a/k/a "Knowledge,")	
DEMETRIUS LEMUS,)	
a/k/a "Tracy Vegas,")	
a/k/a "Booby,")	
NOEL LOPEZ,)	
a/k/a "Finesse,")	
MELISSA RAMLAKHAN,)	
a/k/a "India,")	
EMILY COLLINS-KOSLOSKY,)	
a/k/a "Amber Higgins,")	
a/k/a "Madonna,")	
JACQUELINE COLLINS-KOSLOSKY,)	
a/k/a "Kelly Blanche,")	
a/k/a "Fortune,")	
ANNA ARGYROUDIS,)	
a/k/a "Goddess,")	
KEMYRA JEMERSON,)	
a/k/a "Shereka Minor,")	
a/k/a "Karen Wakefield,")	
a/k/a "Slim Shady")	

SUPERSEDING INDICTMENT**(Conspiracy to Transport Minors to Engage in Prostitution)**

The Grand Jury in and for the District of New Jersey, sitting at Camden charges:

1. From in or about January 1999 to in or about December 2005, in the District of New Jersey, and elsewhere, defendants

MATTHEW D. THOMPCKINS,
a/k/a "Seymore Benjamin," a/k/a "Craig Williams," a/k/a "Brandon Williams," a/k/a
"Knowledge,"
DEMETRIUS LEMUS,

a/k/a "Tracy Vegas," a/k/a "Booby,"
NOEL LOPEZ,
a/k/a "Finesse,"
MELISSA RAMLAKHAN,
a/k/a "India,"
EMILY COLLINS-KOSLOSKY,
a/k/a "Amber Higgins," a/k/a "Madonna,"
JACQUELINE COLLINS-KOSLOSKY,
a/k/a "Kelly Blanche," a/k/a "Fortune,"
ANNA ARGYROUDIS,
a/k/a "Goddess,"
and
KEMYRA JEMERSON,
a/k/a "Shereka Minor," a/k/a "Karen Wakefield," a/k/a "Slim Shady,"

did knowingly conspire and agree with each other and with others to transport individuals who had not attained the age of 18 years in interstate commerce with the intent that the individuals engage in prostitution, contrary to Title 18, United States Code, Section 2423 (a).

Object of the Conspiracy

2. It was the object of the conspiracy to recruit and transport minor girls and others between various cities, including Atlantic City, New Jersey, Bronx, New York and Las Vegas, Nevada, to engage in prostitution for the financial benefit of the defendants and their co-conspirators.

Manner and Means of the Conspiracy

3. It was part of the conspiracy that the defendants and their co-conspirators managed a large-scale prostitution ring that operated in several states including, but not limited to, New Jersey, New York, Nevada, Pennsylvania, Florida, Massachusetts and the District of Columbia.

4. It was further part of the conspiracy that the defendants and their co-conspirators

recruited and transported minor girls between several states for the purpose of engaging in prostitution.

5. As a result of their actions in furtherance of the conspiracy, the defendants and their co-conspirators derived substantial income from the prostitution of minor girls and others.

Overt Acts

In furtherance of the conspiracy, and to effect its unlawful object, the defendants and their co-conspirators committed and caused to be committed the following overt acts in the District of New Jersey and elsewhere:

6. In or about December 2003, defendant **MATTHEW D. THOMPkins** caused a minor girl, referred to herein as Minor Girl 1, to travel from Atlantic County, New Jersey to Las Vegas, Nevada to work as a prostitute.

7. On or about July 1, 2005, defendant **KEMYRA JEMERSON** caused a minor girl, hereinafter referred to as Minor Girl 2, to travel from Las Vegas, Nevada to New York to work as a prostitute for defendant **MATTHEW D. THOMPkins**.

8. On or about July 2, 2005, Minor Girl 2 met with defendant **MATTHEW D. THOMPkins** in New York, where he bought her clothes to wear while working as a prostitute.

9. On or about July 5, 2005, Minor Girl 2 traveled from New York to New Jersey to work as a prostitute for defendant **MATTHEW D. THOMPkins**.

In violation of Title 18, United States Code, Section 2423(e).

FIRST FORFEITURE ALLEGATION

1. Upon conviction of the offense alleged in Count 1 of this Superseding Indictment, defendants **MATTHEW D. THOMPkins**, a/k/a "Seymore Benjamin," a/k/a "Craig Williams," a/k/a "Brandon Williams," a/k/a "Knowledge," **DEMETRIUS LEMUS**, a/k/a "Tracy Vegas," a/k/a "Booby," **NOEL LOPEZ**, a/k/a "Finesse," **MELISSA RAMLAKHAN**, a/k/a "India," **EMILY COLLINS-KOSLOSKY**, a/k/a "Amber Higgins," a/k/a "Madonna," **JACQUELINE COLLINS-KOSLOSKY**, a/k/a "Kelly Blanche," a/k/a "Fortune," **ANNA ARGYROUDIS**, a/k/a "Goddess," and **KEMYRA JEMERSON**, a/k/a "Shereka Minor," a/k/a "Karen Wakefield," a/k/a "Slim Shady," shall forfeit to the United States pursuant to 18 U.S.C. § 2253, any property constituting and traceable to gross profits and other proceeds obtained from said violation, and any property used and intended to be used to commit and to promote the commission of said violation, including but not limited to the following:

A. *Money Judgment*: A sum of money, in United States currency, representing the amount of proceeds obtained as a result of the offense alleged in Count 1 of this Superseding Indictment for which the defendants are joint and severally liable;

B. *Real Property*: All that lot and parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements located at and more particularly described as follows:

- (1) New York: 3530 Holland Avenue, Bronx, New York 10467-6020;
- (2) New York: 16 Tall Tulip Lane, Yonkers, New York; 10710-2326
- (3) New York: 909 East 169 Street, Bronx, New York; 10459-1083
- (4) New York: 508 Central Park Avenue, Unit 5102, Scarsdale, NY

10583;

- (5) New Jersey: 719 2nd Avenue, Galloway Township, New Jersey
08205;

C. *Conveyance*: All motor vehicles as more particularly described as follows:

- (1) 2003 GMC Hummer H2, VIN# 5GRGN23U13H100543;
- (2) 2003 Mercedes Benz SL500, VIN# WDBSK75FX3F017851;
- (3) 2003 Land Rover RRV, VIN# SALMB11423A 105441;
- (4) 2002 BMW 745, VIN# WBAGL63452DP50977;
- (5) 2002 Cadillac Escalade, VIN# 1GYEK63N52R 205221;
- (6) 2000 Mercedes Benz 500, VIN# WDBPJ75J4Y A007429;
- (7) 1999 Lexus RX300, VIN# JT6HF10UXX0031980;
- (8) 1997 Ford Expedition, VIN# 1FMFU18L9VLA 74795;

D. *Bank Account*: All United States currency funds or other monetary instruments credited to account number 0000873715 in the name of defendants MATTHEW THOMPkins and MELISSA RAMLAKHAN located at the Municipal Credit Union, 2 Lafayette Street, New York, New York and the following account numbers in the following names, located at JP Chase Bank, 1 Chase Manhattan Plaza, New York, New York:

ACCOUNT	ACCOUNT NUMBER	ACCOUNT HOLDER
Money Market	019202312665	MATTHEW D. THOMPkins
Savings	091-0903300-01	MATTHEW D. THOMPkins
Checking	091-0903300-65	MATTHEW D. THOMPkins and MELISSA RAMLAKHAN

E. *Other property as more particularly described as follows:*

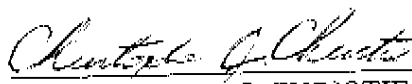
- (1) all cellular telephones including phones associated with the following mobile telephone numbers: 347-351-9678, 646-671-4445, 646-228-1564, 646-304-2705, 646-316-6949, 646-667-2371, 646-633-7013, 646-228-1769, 646-316-4683, 702-812-9165;
- (2) any computers and computer equipment;

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third party;
- C. has been placed beyond the jurisdiction of the court;
- D. has been substantially diminished in value; or
- E. has been commingled with other property which cannot be divided without difficulty;

then it is the intent of the United States of America to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above, pursuant to Title 18, United States Code, Section 2253(o).

In violation of Title 18, United States Code, 2253(a).


CHRISTOPHER J. CHRISTIE
United States Attorney

A TRUE BILL

FOR PERSON